

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Kevin E. Trusty : Chapter 13  
:   
:   
Debtor : No.: 22-10971-mdc

---

CERTIFICATE OF NO RESPONSE

I, William D. Schroeder, Jr., attorney for debtor, filed a Motion to Avoid Judicial Lien of American Express National Bank on July 29, 2022. The parties listed below were served with the Motion and Notice. Neither the undersigned nor the Movant has received an objection or response from any interested party.

The Movant hereby requests the Court to grant the Motion.

Kia N. House  
Zwicker & Associates, PC  
3220 Tillman Drive  
Suite 215  
Bensalem, PA 19020  
Attorney for American Express National Bank

Katie E. Hankard  
Authorized Agent for  
American Express National Bank  
c/o Zwicker & Associates, P.C.  
80 Minuteman Road, P.O. Box 9043  
Andover, MA 01810-1041  
[bknotices@zwickerpc.com](mailto:bknotices@zwickerpc.com)

Stephen Squeri  
Chief Executive Officer  
American Express  
World Financial Center  
200 Vesey Street  
New York, NY 10285

Kevin Trusty  
530 Graystone Road  
Ambler, PA 19002

Trustee Kenneth E. West  
Chapter 13 Standing Trustee  
P.O. Box 1229  
Philadelphia, PA 19105

Office of The United States Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107

/s/William D. Schroeder, Jr.  
William D. Schroeder, Jr.  
Attorney for Debtor  
920 Lenmar Drive  
Blue Bell, PA 19422  
(215) 822-2728  
[schroeder@jrlaw.org](mailto:schroeder@jrlaw.org)